

THE DIRECTOR OF CENTRAL INTELLIGENCE

WASHINGTON, D.C. 20505

Deputy Director for National Foreign Assessment

29 JAN 1980

STATINTL

MEMORANDUM FOR:

Chairman
Task Force on Uniform Guidelines on Employee
Selection Procedures

SUBJECT

Task Force Report on Uniform Guidelines on Employee
Selection Procedures

REFERENCE

: Memorandum from the DDCI, dated 9 January 1980,
Same Subject.

1. The intra-agency task force established to review the recommendations of the Subject guidelines has, in my view, performed well in handling a subject that is, obviously, loaded with ambiguity.
2. Based on the memorandum from the Office of General Counsel, dated 13 June 1979, I understand that the Agency must begin implementation of this program and the National Foreign Assessment Center fully supports this determination. However, I recommend that we move forward with a complete understanding by all concerned of the many ramifications of the program which we are about to undertake.
3. I believe that these guidelines will have a serious impact on the Agency and that the record keeping requirements and determinations of adverse impact, if not handled correctly, will have major consequences at the NFAC office level, possibly including some negative impact on their ability to perform their primary function of analysis. I concur with the statement by the task force that immediate implementation across the board appears to be impossible but I am concerned that all aspects of these guidelines be considered before any implementation is initiated. It is readily apparent that the task force, as stated on Page 21 of Phase II implementation "Required far more time for research and discussion than was available". This is particularly evident in all of the recommendations under Phase II implementation. I am particularly concerned with these areas and believe that their long range impact receive full consideration before any implementation begins. Nowhere in the Task Force Report do I see any reference to consultation with other Government Agencies. What are they doing? Is there anything that we can learn from them?

4. I have attached a list which gives an NFAC opinion on each of the recommendations in order.


Bruce C. Clarke, Jr.

STATINTL

Attachment:
As Stated

NFAC OPINIONS REGARDING THE TASK FORCE REPORT ON
UNIFORM GUIDELINES ON EMPLOYEE SELECTION PROCEDURES

RECOMMENDATION 1

Obviously the publication of a Headquarters Notice is the first step before implementation can begin. We believe that the initial Notice should incorporate recommendation 26, i.e. provisions for a training program. The initial notice should not be issued until the comprehensive program has been fully developed.

RECOMMENDATION 2

A self-identification sheet is necessary, but we envision problems because of previous complaints from applicants who completed applications which had a question regarding race on the application form. We have here a "damned if you do and damned if you don't" problem. The comments section states that the self-identification should not be part of the PHS. Yet, by forwarding it with the PHS package doesn't it in reality become part of the PHS to the applicant?

RECOMMENDATION 3

Comments in Recommendation 2 state that the self-identification sheet is not part of the PHS and the sheet itself states that completion is voluntary, yet this recommendation defines an applicant as one whose file contains a completed PHS and self-identification sheet. This is confusing.

Recommendation 4

Concur

Recommendation 5

Again ambiguity exists. If offices are to maintain individual statistical sheets, how is the file of an applicant who is of interest to several offices to be counted.

Recommendation 6

Concur

Recommendation 7

Concur

Recommendation 8

Concur, but as mentioned in the covering memorandum the record keeping chain in NFAC starts to build up.

Recommendation 9

Since this part of the record keeping process will occur after processing of an applicant has been initiated and the individual offices are keeping records of similar information isn't this duplication of effort?

Recommendation 10

Concur, but more work in the record keeping area. Also, we do not understand the comment in this section that this information cannot be divulged to promotion boards and panels before or after their deliberations. It would seem that we would want to do this so that we are not accused of adverse impact.

Recommendation 11

Concur, but more additional bookkeeping within the Directorate.

Recommendation 12

Concur

Implementation

We disagree with the comment that the record keeping requirement is a relatively simple paper-and-pencil method. We believe that very exacting records will have to be kept and that the task force has an overly optimistic view of the record keeping problem. If these guidelines stood apart from the personnel management system of the Agency, with an individual unit responsible, the comments might be true, but they do not. They are, in fact, part of a personnel system which while attempting to implement these guidelines, is also attempting to implement the recommendations as proposed by NAPA, etc. We believe that these guidelines will provide additional stress on an overly burdened personnel management system.

Recommendation 13

Concur, but with the relocation of OP, could this officer work more closely with the D/EEO.

Recommendation 14

Concur.

Recommendation 15

Nonconcur. The D/OPPPM should work together with the D/EEO as a responsible officer in this area.

Recommendation 16

Concur, but based on our prior experience in the EEO statistical area, we are concerned that an accumulation of adverse impact findings will seriously disrupt our offices' normal course of business.

Recommendation 17

Concur as long as the personnel officer, as is now the case, be authorized as the responsible officer required to give specific, job related reasons for non-selection of an applicant.

Recommendation 18

(See Alternative Recommendation 18)

Recommendation 19

(See Alternative Recommendation 19)

Alternative Recommendation 18

Concur

Alternative Recommendation 19

Concur

Alternative Recommendation 19A

Believe that this should be incorporated into Alternative Recommendation 19.

Recommendation 20

Concur

Recommendation 21

Concur, but believe that these determinations should be made prior to the issuance of a Headquarters Notice on these guidelines (see Recommendation 1).

Recommendation 22

Same comment as Recommendation 21.

Recommendation 23

Same comment as Recommendation 21.

Recommendation 24

Same comment as Recommendation 21.

Recommendation 25

Same Comment as Recommendation 21.

Recommendation 26

Same Comment as Recommendation 21.

Recommendation 27

Same comment as Recommendation 21.

Recommendation 28

Same comment as Recommendation 21.